

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., et al. ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 429 & 929

**CERTIFICATION OF COUNSEL REGARDING
FIFTH NOTICE OF ASSUMPTION AND ASSIGNMENT OF
CERTAIN EXECUTORY CONTRACTS AND/OR UNEXPIRED
LEASES RELATING TO PHIL SIMON ENTERPRISES, INC.**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On May 16, 2025, the Debtors filed the *Fifth Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 929] (the “Fifth Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth in the Fifth Assumption Notice (the “Original Assumption List”). Attached to the Fifth Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of the Original Assumption List.

2. The deadline to object to the Fifth Assumption Notice was May 30, 2025 (the “Objection Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Although the landlord for store number 2500, Phil Simon Enterprises, Inc. (“Simon”) did not object or provide informal comments to the Fifth Assumption Notice, after the Fifth Assumption Notice was filed, Simon agreed to waive the proposed cure amount listed therein pursuant to an agreement between Simon and the proposed assignee, Dollar Tree Stores, Inc. (“Dollar Tree”).

4. Attached hereto as **Exhibit A** is a revised proposed form of order (the “Revised Assumption Order”) assigning the Simon lease listed in the Fifth Assumption Notice to Dollar Tree. A redline comparing the Revised Assumption Order to the Assumption Order is attached hereto as **Exhibit B**.

5. The Revised Assumption Order has been shared with counsel to Simon and Dollar Tree, neither of whom object to entry of the Revised Assumption Order.

6. Any leases subject to unresolved objections or informal comments received regarding Fifth Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the Fifth Assumption Notice remains pending, and has not been withdrawn, with respect to any Outstanding Leases. To the extent that the Debtors and any landlord party to an Outstanding Lease reach agreement with respect to any Outstanding Lease, the Debtors will submit a proposed form of order with respect to such lease.

7. Accordingly, the Debtors request entry of the Revised Assumption Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

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Dated: June 30, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

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